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July 19, 2023

Via ECF:

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Guo et al v. Centene Corporation et al*
Case No. 22-cv-01743

Dear Judge Ramos:

This firm represents Plaintiffs in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request a stay of all proceedings in this action, which will include a stay of discovery, and all pending deadlines, motions and conferences including the discovery conference scheduled before Your Honor for July 20, 2023, at 11:00 AM.

After several discussions, the parties have agreed to engage in private class-wide mediation.

The parties request this stay continue pending the completion of the parties' contemplated class mediation, which the parties expect will be completed within 90 days from the date of this letter (due to the holidays, the mediator's anticipated schedule, and the time it will take for the parties to complete a pre-mediation exchange of records).

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter two weeks after the mediation is completed. If the parties are unable to reach a resolution through mediation, the parties propose that they with their joint letter submit a joint amended Scheduling Order and request for renewal of the currently pending discovery motion and all other deadlines.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

The case is stayed pending mediation. The parties are directed to file a status update within two days of the conclusion of mediation. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: July 19, 2023

New York, New York